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Attorneys for Defendants
BEAUTY INDUSTRY GROUP, OPCO LLC
BELLAMI HAIR, LLC
RANDILYN DELA CRUZ

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

KAREN SANCHEZ, an individual,

Plaintiff,

v.

BEAUTY INDUSTRY GROUP, OPCO
LLC, BELLAMI HAIR, LLC,
RANDILYN DELA CRUZ, and DOES 1
through 100, inclusive,

Defendants.

Case No.

[Los Angeles Superior Court Case No.
24STCV03811]

**DECLARATION OF DARIN JACOBS
IN SUPPORT OF DEFENDANTS'
NOTICE OF REMOVAL OF CIVIL
ACTION TO UNITED STATES
DISTRICT COURT**

*[Filed concurrently with Notice of
Removal; Civil Cover Sheet; Declarations
of Dana L. Peterson, Randilyn Dela Cruz,
and Brian Garcia in support thereof;
Notice of Interested Parties; Corporate
Disclosure Statement]*

DECLARATION OF DARIN JACOBS

I, Darin Jacobs, hereby declare and state as follows:

1. I make this declaration in support of Defendants’ Beauty Industry Group Opco, LLC (“BIG Opco”), Bellami Hair, LLC (“Bellami Hair”), and Randilyn Dela Cruz (“Dela Cruz”) (or collectively, “Defendants”) Notice of Removal.

2. I am the Chief Financial Officer for BIG PledgeCo, LLC, and I work at BIG PledgeCo, LLC’s corporate office in Salt Lake City, Utah. As a result of my position, I have personal knowledge of the corporate status and structure of BIG Opco and Bellami Hair, and access to information and data related to BIG Opco and Bellami Hair’s business operations, as well as its related or affiliated entities.

3. This declaration is based on my personal knowledge and on business records created and maintained by BIG PledgeCo, LLC in the regular course of business. With respect to those business records, the entries are made in a timely manner by people with knowledge of the information, and it is the regular practice of BIG PledgeCo, LLC’s business to maintain such records.

4. In my position, I have access to all of the corporate information that is included in this declaration. If called upon to testify as to the facts set forth in this declaration, I could and would competently testify to them.

I. INFORMATION PERTAINING TO THE BIG OPCO AND BELLAMI HAIR

5. Beauty Industry Group Opco, LLC is a limited liability company that at all relevant times during this litigation was organized and existing under the laws of the State of Delaware. At all times since Plaintiff commenced this lawsuit, Beauty Industry Group Opco, LLC’s sole member has been BIG PledgeCo, LLC. BIG PledgeCo, LLC is organized under the laws of the State of Delaware, and it owns 100% of Beauty Industry Group Opco, LLC.

6. Bellami Hair, LLC is a limited liability company that at all relevant times during this litigation was organized and existing under the laws of the State of Delaware.

At all times since Plaintiff commenced this lawsuit, Bellami Hair, LLC's sole member has been Bellami, LLC, which owns 100% of Bellami Hair.

7. At all times since Plaintiff commenced this lawsuit, Bellami, LLC's sole member has been BIG PledgeCo, LLC, which owns 100% of Bellami, LLC.

II. INFORMATION PERTAINING TO BIG PLEDGECO, LLC

8. At all times since Plaintiff commenced this lawsuit, BIG PledgeCo, LLC's sole member has been BIG Buyer, LLC. BIG Buyer, LLC is organized under the laws of the State of Delaware, and it owns 100% of BIG PledgeCo, LLC.

9. At all times since Plaintiff commenced this lawsuit, BIG Buyer, LLC's sole member has been BIG Intermediate, LLC, organized under the laws of the State of Delaware. BIG Intermediate, LLC owns 100% of BIG Buyer, LLC.

10. At all times since Plaintiff commenced this lawsuit, BIG Intermediate, LLC's sole member has been Notorious Topco, LLC, organized under the laws of the State of Delaware. Notorious Topco, LLC owns 100% of BIG Intermediate, LLC.

11. At all times since Plaintiff commenced this lawsuit, Notorious Topco, LLC's sole member has been Notorious Guarantor LLC, organized under the laws of the State of Delaware. Notorious Guarantor LLC owns 100% of Notorious Topco, LLC.

12. At all times since Plaintiff commenced this lawsuit, Notorious Guarantor LLC's sole member has been Notorious Holdings, LLC, organized under the laws of the State of Delaware. Notorious Holdings, LLC owns 100% of Notorious Guarantor.

13. At all times since Plaintiff commenced this lawsuit, Notorious Holdings, LLC's sole members have been Notorious Purchaser II, Inc. and Notorious Blocker, Inc.

A. INFORMATION PERTAINING TO NOTORIOUS PURCHASER II, INC.

14. Notorious Purchaser II, Inc. is a corporation that at all relevant times during this litigation was organized and existing under the laws of the State of Delaware.

1 15. Notorious Purchaser II, Inc. does not have a physical corporate headquarter
2 or principal place of business in any state. The mailing address used for tax or other
3 official notices is 1250 N Flyer Way, Suite 100, Salt Lake City, Utah 84116.

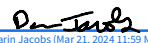
4 **B. INFORMATION PERTAINING TO NOTORIOUS BLOCKER, INC.**

5 16. Notorious Blocker, Inc. is a corporation that at all relevant times during this
6 litigation was organized and existing under the laws of the State of Delaware.

7 17. Notorious Blocker, Inc. does not have a physical corporate headquarter or
8 principal place of business in any state. The mailing address used for tax or other official
9 notices is 1250 N Flyer Way, Suite 100, Salt Lake City, Utah 84116.

10 I declare under penalty of perjury under the laws of the United States and the laws
11 of the States of Utah and California that the foregoing is true and correct.

12 Executed this 21st day of March 2024, at Salt Lake City, Utah.

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15 Darin Jacobs (Mar 21, 2024 11:59 MDT)
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